

From: [Dan Peacock](#)
To: [Bill Jacobs](#)
Subject: Fw: Request for Copy or Link to Food/Nonfood Use Memo for Rodenticides, 7173-EON, Chlorophacinone
Date: 10/06/2011 06:54 AM

Bill,

Sue has provided me with what I need. I am copying you in case you want to capture a copy.

Thank You,

Daniel B. Peacock, Biologist
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Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Addresses:
United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch,
Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001


Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division,
Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

----- Forwarded by Dan Peacock/DC/USEPA/US on 10/06/2011 06:52 AM -----

From: Susan Hummel/DC/USEPA/US
To: Dan Peacock/DC/USEPA/US@EPA
Cc: Bill Jacobs/DC/USEPA/US@EPA, Jennifer Urbanski/DC/USEPA/US@EPA, Richard Loranger/DC/USEPA/US@EPA, Felecia Fort/DC/USEPA/US@EPA
Date: 10/05/2011 03:40 PM
Subject: Re: Request for Copy or Link to Food/Nonfood Use Memo for Rodenticides, 7173-EON, Chlorophacinone

Hand scattering around burrows surrounded by bare ground is non-food.

The database you want for this is the Archive DB. All databases of HED documents are on the server that ends in "4Indo"

Here's a link to the memo 

Sue Hummel, Chemist/Senior Scientist
Health Effects Division
EPA Office of Pesticide Programs
1200 Pennsylvania Ave., NW (7509P)
Washington, DC 20460-0001
703-305-7689; alt. workspace 703-590-2897 or 703-380-4993
Deliveries: One Potomac Yard (South Building), 2777 S. Crystal Drive, Arlington, VA 22202

▼ Dan Peacock---10/05/2011 02:13:10 PM---Sue and Bill, I need a copy of the memo or memos developed over 20 years ago that made cuts as to wh

From: Dan Peacock/DC/USEPA/US
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Cc: Bill Jacobs/DC/USEPA/US@EPA, Richard Loranger/DC/USEPA/US@EPA, Jennifer Urbanski/DC/USEPA/US@EPA
Date: 10/05/2011 02:13 PM
Subject: Request for Copy or Link to Food/Nonfood Use Memo for Rodenticides, 7173-EON, Chlorophacinone

Sue and Bill,

I need a copy of the memo or memos developed over 20 years ago that made cuts as to when HED considered a rodenticide use to be "food" or "non-food".

Sue, I know that you gave me a link to one of HED's policy databases where the memo(s) were stored about 2 years ago. Can you give me another link? I believe that it might be filed under the rodenticide, "Strychnine". I seem to have misfiled my copy.

I am working with Oonni in HED on a rodenticide (Chlorophacinone, an anticoagulant) used in rangeland to determine which application methods are food and which are non food.

Bait boxes are clearly "non-food". Ground Broadcast with a spreader is clearly "food". Hand scattering around burrows is in a gray area. As I recall, HED considered it "non-food" under certain cases, but I have seen other documents that are less clear (1998 Zinc Phosphide RED).

Thank You,

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